

EXHIBIT 16

1 SurveyMonkey is. I used SurveyMonkey in 2013 as well.

2 Q. You did? Okay. Tell me what SurveyMonkey is
3 and why you used it in both reports.

4 A. It's the online survey tool that you program
5 your survey in so that when the participant went on the
6 computer kiosk at the trade show in both cases, they
7 were log -- they were going into SurveyMonkey because
8 that's where the survey was housed.

9 Q. And did you keep the data, the results for both
10 surveys?

11 A. I have the data for 2015. I believe I gave you
12 what I had for 2013. I'm not sure if it was my error or
13 SurveyMonkey, but everything before 2014 has been
14 eliminated from my account, and I don't know if that's
15 their cleansing process or my membership package or what
16 that is, but they have no records of anything before 14.

17 Q. Do you know when that elimination, however you
18 want to call it, took place?

19 A. No.

20 Q. Okay. And so that is the data and information
21 that was generated as part of the 2013 survey that's
22 been deleted?

23 A. Yes.

24 Q. And when did you determine that that data had
25 been deleted?



1 I'm telling you what's in the report is accurate. I
2 don't have the back-up data, we've established that. It
3 was deleted from the system. But I'm not a liar.

4 Q. So there's no way that we can test your opinion
5 that, of the 69, some number selected Chore-Time because
6 of red; is that correct?

7 A. It's --

8 MR. NAYAK: Objection as to form, it
9 mischaracterizes her previous testimony.

10 A. It's not my opinion. It is the analysis of the
11 word cloud. We've established that.

12 Q. Okay. And we cannot rely on the actual
13 respondent's answers that your counsel provided to us in
14 Exhibit 4; is that correct?

15 A. From the day that I delivered that, I said I do
16 not have the actual raw data, this data has been
17 manipulated, it was in my file. I don't know -- I can't
18 put a lot of credence in this. I've been very honest
19 about that. It would have been much simpler for me just
20 to say, you know what, I don't have anything, but I
21 didn't. I gave it to you the way that I have it.

22 Q. When you say --

23 A. That's all I have.

24 Q. -- the data was manipulated, who manipulated
25 the data?



1 A. Well, I would have. As you saw on that one
2 page, I went in and did some math in the Excel
3 spreadsheet which gave us that 32 percent answer versus
4 the 21 percent answer. This is a working document to
5 me. This was not the final true raw results. I've been
6 saying that from the very beginning.

7 Q. You don't have --

8 A. You can't count on this.

9 Q. You don't have in your report a number or a
10 percentage that ties to the number of Chore-Time
11 respondents who picked Chore-Time, of the 69 how many
12 that did so because they picked a color or identified a
13 color?

14 A. I don't have that any longer, no, but I did in
15 that report.

16 Q. What's the number? How many out of 69?

17 A. The vast majority according to the word cloud.

18 Q. What's the vast majority? What's the number?
19 Where did you tie that to a percentage in your report?
20 You didn't?

21 A. I didn't.

22 Q. So it's just your generalized view that some
23 percentage of those picked the color red?

24 A. Okay, it's not my generalized view. It's not
25 -- an analysis tool provided by SurveyMonkey which

